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Food and Agricultural Import Regulations and Standards

New Food Safety and GMO Labeling Requirements 2002

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Report Highlights:

New food safety regulations for the Russian Federation will enter into force on September 1, 2002. Although some changes are minor and others are progressive, worrisome is the new requirement for mandatory labeling of some types of GMO products.

Includes PSD changes: No
Includes Trade Matrix: No
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Executive Summary

On September 1, 2002 the new official hygiene norm for all food products produced, imported and sold on the territory of the Russian Federation will come into effect. The document, titled "Hygiene Requirements for Safety and Nutritious Value of Food Products" (Sanitary-Epidemiological Rules and Norms. SanPiN 2.3.2.1078 - 01)" (hereinafter SanPiN-01) replaces the previous SanPin of 1996 (SanPiN-96) and changes approaches and requirements for safety of food products in general and for some specific foods. An important new component of this revision is that it introduces the term "GMO products" and requires mandatory labeling of GMO products or products with GMO components. SanPiN-01 was prepared by the Russian Ministry of Health and the Nutrition Institute of the Russian Academy of Medical Sciences, and was approved by the Chief Sanitary Physician in November, 2001. The intention was to implement SanPiN-01 on July 1, 2002, but by Resolution #18 of May 31, 2002, the implementation was postponed to September 1, 2002. In August 2002 it was issued as official publication.

SanPiN-01 is the third version of the official sanitary rules and norms which regulate the safety and quality of food products produced, imported and sold on the territory of the Russian Federation. The first, "Medical-Biological Requirements and Health Standards for Food and Processed-Food Ingredient Quality", was issued in 1989, and in 1997 it was replaced by "Hygiene Requirements for the Quality and Safety of Foodstuff Raw Materials and Foodstuffs" (SanPiN-96). The main provisions of SanPiN-96 and specifications for meat and poultry products were given in Post's GAIN Report #RS2010.

The Office of Agricultural Affairs is presently translating the main sections of the new regulations, and will make them available via the GAIN system in the near future.

Some Changes and Innovations

Changes in Hygiene Norms

In the new SanPiN, changes in hygiene norms for product groups are not very significant, and in many cases unify tests or slightly decrease the number of obligatory parameters. For example, in the group "Poultry, including semi-finished products, fresh, chilled, frozen", copper, zinc and nitrozamines have been excluded from the list of toxic elements.

Nutrition Requirements

SanPiN-01 reduces the "nutritious value" requirements of its predecessor by decreasing the list of food products for which nutrition parameters are prescribed. SanPiN-01 states that "indicators of the nutritional value of food products are settled by the food producer..." However, "some food products shall correspond with the nutrition value indicators required in the present sanitary rules.

In an attachment, SanPiN-01 determines nutritious value requirements for aggregated groups of processed meat, poultry, dairy and fish products only. The total list of these products decreased from 68 items in SanPiN-96 to 17 items in SanPiN-01. Energy value parameters will also be excluded. Nutritious Value is not determined in SanPiN-01 for grain and grain products, for vegetable, fruits and products, nor for sugar and confectionary products. However, a separate very detailed criteria table for the nutritional value of fruit and vegetable juices is now included. SanPiN-01 separately provides detailed hygiene and nutritious value requirements for baby food, food for school children and for diet food products.

General Labeling Requirements

SanPiN-01 does not prescribe labeling format (the list of all information that shall be on the label, including shelf life of products, place of production, etc.) of food products, as had been the case in SanPiN-96. The reason for this is likely that control over label format in general is a function of the Trade Inspection Department of the Ministry of Economic Development and Trade rather than Ministry of Health. SanPiN-01 also requires the provision of information about nutrition value on food product labels. However, this requirement is included in the "reference" attachment (which contains comparisons with international norms and data on testing methods), while in the previous SanPiN-96 these requirements were in the "recommended" (essentially obligatory) attachment.

Labeling and Registration Requirements for Food Additives and Products from Genetically Modified Sources

SanPiN-01 specifies in detail what information is required on labels of baby, diet and special foods, food additives, biologically active food additives and GMO food products. The following information is mandatory for these products:

- type of use (for baby food, diet and specialized foods, food additives and biologically active additives for food);
- names of ingredients making up the food product, food additives, microbe culture, ferments and substances used for enrichment of food products; in biologically active additives for food and in enriched food products with biologically active components, the percent of the daily physiological requirement shall be also indicated if this requirement exists;
- recommendations for use, utilization, and, if necessary, contra-indication for use;
- the biologically active additive for food shall state that "it is not a pharmaceutical";
- food products made of genetically modified sources shall have one of the following inscriptions: "genetically modified product", or "product derived from genetically modified sources", or "this product contains components of genetically modified sources" (for food products containing more than five percent of GMO components);
- information about the state registration.

GMO labeling requirements for food products appear in SanPiN-01 for the first time. Up to now the labeling of GMO foods in Russia has been voluntary, although the Decree of the Chief Sanitary Physician of September 26, 1999 (see GAIN Report RS9057) required that starting July 2000 all food products and medical preparations obtained from genetically modified sources shall have correspondent marking on the retail pack. Two years were given to industry to prepare for this labeling as well as to the Ministry of Health to equip some laboratories with special testing equipment. In this period a series of Government Resolutions and Orders of the Chief Sanitary Physician were issued on mandatory registration of GMO products and procedures of registration (see GAIN Reports RS1018 and RS1032). Food products which contain GMOs shall go through the procedure of sanitary and epidemiological expertise and testing in the Ministry of Health and the Nutrition Institute and shall be placed in the special register monitored by the Ministry of Health. SanPiN-01 requires not only GMO labeling, but information about the state registration on labels.

There are several provisions in the SanPiN-01, which, according to specialists, make requirements for GMO registration and labeling less onerous than in many other countries. For example, "food products made of genetically modified sources which do not contain DNA or protein do not have to be labeled additionally if they are completely equivalent in nutritional value of the traditional analogue". SanPiN-01 also specifies a list of GMO food products subject to mandatory labeling and list of products which do not need labeling.

Implementation of SanPiN-01

The status of SanPiN-01 gives the field inspectors of the Ministry of Economic Development and Trade of the Russian Federation and the field officers (sanitary physicians) of SanEidNadzor (Department of Sanitary and Epidemiologic Surveillance) of the Ministry of Health of the Russian Federation the right to withdraw from trade products which do not meet SanPiN-01 requirements. According to the Russian Nutrition Institute, there are enough laboratories in Russia which are equipped to conduct GMO tests.

FOOD PRODUCTS MADE OF GENETICALLY MODIFIED SOURCES

a) food products subject to mandatory labeling:

Raw material	Food products
Soya	1. Soybeans
	2. Soybean sprouts
	3. Soybean protein concentrate and its textured forms
	4. Soybean protein isolate
	5. Hydrolysis of soybean protein
	6. Soybean flour and its textured forms
	7. Milk substitute (soy milk)
	8. Dry milk substitute (dry soy milk)
	9. Canned soybeans
	10. Boiled soybeans
	11. Roasted soybeans
	12. Roasted soybean flour
	13. Products made of/with use of soy protein isolate, soy protein concentrate, soybean protein hydrolysis, soybean flour, dry soybean milk
	14. Fermented soybean products
	15. Soybean paste and products
	16. Soybean sauce
	17. Products made of/with use of soybean milk (tofu, fermented beverages, ice-cream, mayonnaise)
Corn	1. Corn directly consumed as food (flour, cereal, groats, etc.)

	2. Frozen and canned corn
	3. Popcorn
	4. Corn crisps
	5. Flour mix containing more than 5 percent of corn flour
Potato	1. Potato for direct human consumption
	2. Semi-ready potato products, fast frozen
	- dry potato puree
	- potato flakes
	- potato chips
	- potato crackers (semi-ready)
	3. Potato products, fried
	- potato "straws"
	- sliced potato
	- potato french fries
	4. Concentrates made of potato:
	- flour for pancakes
	- ravioli (varenniki) stuffed with potato
	- instant potato puree
	5. Fast food potato products
	- dry potato, instant
	- fast cooked dry potato
	6. Canned potato products
	7. Potato Molasses (syrup)
Tomatoes	1. Tomatoes for direct food consumption (natural, whole canned)
	2. Tomato paste
	3. Tomato puree
	4. Tomato juice, beverages
	5. Tomato sauces, ketchup

Vegetable Puree	1. Fresh puree
	2. Products made of puree
Melons	1. Fresh melons
	2. Products made of melon
Papaya	1. Fresh papaya
	2. Products made of papaya
Chicory	Products containing chicory
Food additives	Produced from GMO
Biologically active food additives	Containing GMO components

Attachment 4 to SanPiN 2.3.2.1078-01

b) food products, which are NOT subject to mandatory labeling

Raw material	Food products
Soybean	1. Refined soybean oil
	2. Soybean lecithin
	3. Fructose
Corn	1. Refined corn oil
	2. Corn starch
	3. Maltodextrines
	4. Corn starch syrups
	5. Glucose
	6. Fructose
	7. Treacle and other oligo-saccharose
Sugar Beet	1. Sugar
	2. Glucose
	3. Fructose
Potato	1. Potato starch
	2. Glucose
	3. Treacle and other oligo-saccharose
Rapeseed (canola)	Rapeseed oil and products containing rapeseed oil
Flax	Flax oil and products containing rapeseed oil
Cotton	Cotton oil and products containing cotton oil